



Counsel Appear On The Following Page

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NIA MUJADADI-TURAN,

Plaintiff,

v.

MOTOROLA MOBILITY, LLC;
METROPOLITAN LIFE INSURANCE
COMPANY,

Defendants.

CASE NO. 5:15-CV-2752 (EJD)

**JOINT STIPULATION TO CONTINUE
DEADLINE FOR DEFENDANTS
MOTOROLA MOBILITY, LLC AND
METROPOLITAN LIFE INSURANCE
COMPANY TO RESPOND TO
PLAINTIFF'S COMPLAINT**

JOINT STIPULATION

Pursuant to Civil Local Rule 6-1, Plaintiff Nia Mujadadi-Turan (“Plaintiff”) and Defendants Motorola Mobility, LLC (“Motorola”) and Metropolitan Life Insurance Company (“MetLife”) (Plaintiff, Motorola, and MetLife are referred to as the “Parties”), hereby jointly stipulate to a fifth extension of time for Motorola and MetLife to respond to Plaintiff’s Complaint. Pursuant to the Parties Agreement, the deadline for Motorola and MetLife to file their respective responses to Plaintiff’s Complaint will be continued from December 9, 2015 to January 8, 2016. In support of this Stipulation, the Parties agree and stipulate as follows:

1. On June 18, 2015, Plaintiff initiated the present action against Motorola and MetLife in the United States District Court for the Northern District of California. (See ECF, Doc. No. 1.)

2. MetLife was served with the Summons and Complaint in this action on June 26, 2015.

3. Motorola was served with the Summons and Complaint in this action on July 21, 2015.

4. The Parties submitted stipulations extended the deadline for MetLife to respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 11, 14, 20, 25, 29.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 22, 28, 31.)

5. The Parties submitted stipulations extended the deadline for Motorola to respond to the Complaint to facilitate on-going settlement discussions (See ECF Doc. Nos. 13, 21, 24, 30.) Where required, the Court granted each of these stipulations. (See ECF Doc. Nos. 23, 27, 32.)

6. On December 8, 2015, the Parties have agreed to a further thirty (30) day extension of time for Motorola and MetLife to respond to Plaintiff’s Complaint. Accordingly, Motorola and MetLife’s respective responses to the Complaint are now due on or before January 8, 2016.

1 7. The Parties are optimistic that a resolution can be reached in this matter and
2 the additional time will afford the parties the opportunity to continue their settlement opportunities
3 without incurring additional costs of litigation.

4 8. This Stipulation will not alter the date of any event or any deadline already
5 fixed by Court order.

6 9. This is the sixth extension of time sought in this matter on behalf of MetLife
7 and the fifth extension of time sought on behalf of Motorola.

8 We hereby attest that we have on file all holographic signatures corresponding to any
9 signatures indicated by a conformed signature (/s/) within this e-filed document.

10 Dated: December 8, 2015

11 /s/ Beth A. Davis
12 BETH A. DAVIS
13 Attorneys for Plaintiff
 NIA MUJADADI-TURAN

14 Dated: December 8, 2015

15 /s/ Benjamin A. Emmert
16 BENJAMIN A. EMMERT
17 LITTLER MENDELSON, P.C.
18 Attorneys for Defendant
 MOTOROLA MOBILITY, LLC

19 Dated: December 8, 2015

20 /s/ C. Andrew Kitchen
21 C. ANDREW KITCHEN
22 MAYNARD, COOPER, & GALE, LLP
23 Attorneys for Defendant
24 METROPOLITAN LIFE INSURANCE
25 COMPANY

26 Firmwide:137461992.1 071264.1013
27
28

1 Glenn Kantor - SBN 122643
E-mail: gkantor@Kantorlaw.net
2 Beth A. Davis - SBN 277560
E-mail: bdavis@kantorlaw.net
3 Andrew Kantor – SBN 303093
E-mail: akantor@kantorlaw.net
4 KANTOR & KANTOR, LLP
19839 Nordhoff Street
5 Northridge, CA 91324
Telephone: (818) 886-2525
6 Facsimile: (818) 350-6272

7 Attorneys for Plaintiff,
NIA MUJADADI-TURAN
8

9 BENJAMIN A. EMMERT, Bar No. 212157
bemmert@littler.com
10 LITTLER MENDELSON, P.C.
A Professional Corporation
11 50 West San Fernando Street
15th Floor
12 San Jose, CA 95113.2303
Telephone: 408.998.4150
13 Facsimile: 408.288.5686

14 Attorneys for Defendant
MOTOROLA MOBILITY, LLC
15

16 C. ANDREW KITCHEN (SBN 292609)
dkitchen@maynardcooper.com
17 LINDA B. OLIVER (SBN 166720)
loliver@maynardcooper.com
18 ALEXANDRA V. DRURY (SBN 291920)
adrury@maynardcooper.com
19 MAYNARD, COOPER, & GALE, LLP
600 Montgomery Street, Suite 2600
20 San Francisco, CA 94111
Telephone: (415) 704-7433
21 Facsimile: (205) 254-1999

22 Attorneys for Defendant
METROPOLITAN LIFE INSURANCE COMPANY
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24
25
26
27
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